## BAKER BOTTS LLP

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## **VIA ECF**

Hon. Vernon S. Broderick United States District Judge Southern District of New York 40 Centre Street New York, NY 10007

Re: *United States v. John Graves*, 22 Cr. 142 (VSB) (SDNY)

Dear Judge Broderick:

We represent defendant John Graves in this matter. Mr. Graves was arrested on June 24, 2022 and released on a bail package that included conditions of home incarceration and a \$50,000 personal recognizance bond. Those bail conditions, in part, resulted from the fact that Mr. Graves at the time had a pending case in Queens County arising from a domestic incident with his partner. That case has since been dismissed.

Mr. Graves' partner is currently being induced into labor this evening or tomorrow morning. Mr. Graves' requests permission to leave home to attend the childbirth and that the home incarceration condition be lifted until has partner is discharged from the hospital.

Pre-Trial Services has no objection to this request. The government objects.

Respectfully submitted,

/s/ Brendan F. Quigley
Brendan F. Quigley

CC: Counsel of record (via ECF)